



M O S K O W I T Z & B O O K , L L P

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March 31, 2022

**VIA ECF**  
**Submitted *Ex Parte* With**  
**Request for Filing Under Seal**

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Galanis, et al.  
16 Cr 371 (RA)

Dear Judge Abrams:

This letter is respectfully submitted to request authorization, *nunc pro tunc*, for the use of my firm's associate Christopher R. Neff, to assist me in the above captioned case.

I have been a member of the CJA panel in the Southern and Eastern District since I left the U.S. Attorney's Office in 1991. During my entire tenure as a CJA attorney, I have routinely used associates and paralegals to help me represent my court-appointed clients, just as I do on my retained cases. Doing so allows me to give my CJA clients the personal attention they deserve at a cost below that which would be incurred if I provided all the services myself. Moreover, given the numerous pending matters that I handle on a regular basis, the assistance of Mr. Neff will be necessary in order for me to handle my caseload appropriately and in a timely fashion.

Since 1996, when I started my own firm, I have always employed one or more full-time associates and paralegals. Currently, I employ one full-time associate. Mr. Neff, who has been working for my firm for approximately ten years, is experienced in handling criminal matters and is highly skilled. He clerked for Judge Batts in the Southern District for two years before joining my firm. Since joining my firm, he has assisted me in representing dozens of clients in criminal matters and has even assisted me in handling a lengthy and complex criminal trial in New York State Supreme Court, New York County. I can say unequivocally that the quality of legal service that my firm and I provide to Mr. Dunkerley would suffer greatly if Mr. Neff was not allowed to assist me in this matter.

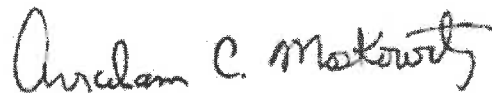
Hon. Ronnie Abrams  
March 31, 2022  
Page 2

In light of the above, it is respectfully requested that the Court authorize my use of Mr. Neff, nunc pro tunc on this matter. Given the fact that he is a full-time employee of my firm and represents a substantial portion of my firm's overhead, it is further requested that the Court authorize me to bill Mr. Neff's time at \$110 per hour, a rate that has previously been approved by numerous judges in this District and in the Eastern District of New York.

Because this letter deals with defense funding it is being submitted ex parte, with a request that it be filed under seal.

Thank you in advance for your consideration of this application.

Respectfully submitted,

A handwritten signature in black ink, reading "Avraham C. Moskowitz". The signature is written in a cursive, flowing style.

Avraham C. Moskowitz

ACM:bmb

THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.


Galanis, et al.,

Defendants.

16 Cr. 371 (RA)

Application granted.

SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
March 21, 2022

**EX PARTE<sup>1</sup> MOTION FOR APPROVAL TO FILE UNDER SEAL**

NOW COMES Hugh Dunkerley, by and through his attorney, Avraham C. Moskowitz, and respectfully moves, *ex parte*, for approval from the Court to file under seal a letter on behalf of defendant, requesting the use of an Associate.

WHEREFORE counsel respectfully request that the relief sought be granted.

On this 18h day of March 2022, it is

Respectfully submitted,  
MOSKOWITZ & BOOK, LLP

By: /s/Avraham C. Moskowitz  
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Counsel to Defendant Hugh Dunkerley

Dated: New York, New York  
March 18, 2022

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<sup>1</sup>This application is filed *ex parte* and under seal pursuant to LCrR 12.2 because it concerns information related to defense strategy that should not be made available to the other parties to this litigation. See Administrative Office of the United States Courts, GUIDELINES FOR THE ADMINISTRATION OF THE CRIMINAL JUSTICE ACT, Section 640.20.